



Scenario 3 - INITIATING CHECKS

A program conducted NSOPR checks on all its applicants prior to their big training and orientation in July. On the first day of orientation they have applicants give written consent to conduct the checks, and fingerprint all the applicants for their FBI and State checks. Is the program in compliance?

Answer: Yes. The initiation of checks must be documented no later than start of service/work (which includes training and orientation if you are counting those hours). The program should develop policies and procedures that ensure documentation of the initiation is being consistently maintained for each individual.



Scenario 4 – ACCOMPANIMENT (Physical Presence)

Now that the program has initiated checks they are waiting on the FBI and State results. For those individuals who do not have access to vulnerable populations, service has begun immediately. For all others, they have been performing supervision until they have the results. Is the program in compliance?

Answer: No. Accompaniment is a higher standard than mere supervision. Accompaniment can be conducted by anyone cleared to have access to vulnerable populations, including guardians of the vulnerable individual, non CNCS funded staff who have access based on the nature of their profession – e.g. nurses, teachers. Until the final rule is in effect, accompaniment may cease when either the FBI OR State checks have cleared.

